

January 18, 2006

Charles Anderson
ICF Consulting
1725 I Street, N.W.
Suite 1000
Washington, DC 20006

Dear Mr. Anderson:

This communication is in response to the Draft 1 of Version 2.0 roof products specification you were kind enough to e-mail to our office.

To begin with I want to assure you that our company fully appreciates the good intentions of the EPA ENERGY STAR program. Our concerns and interests are in regard to that program's execution. Our current review that follows is not necessarily in order of issue importance.

1. To begin with we question whether or not these new testing procedures on unqualified products gives an advantage to those companies who qualified their materials under standards less severe. For example, if the initial solar reflectance in the amended document should be 0.70 are all who qualified products under the original test criteria with initial solar reflectance at 0.65 'grandfathered' because of their original qualification?
2. With respect to the consideration EPA is giving to increasing the initial reflectance to 0.70, while still maintaining the aged value at 0.50, we wonder if it is the initial reflectance that should be the determining factor in the energy saving value of the product or is it the reflectance value over the three year period that is more relevant, as we believe.

We would suggest the initial reflectance should remain at the 0.65 level. Doing so would not raise the issue of those having to comply with the proposed amended change being at an unfair competitive disadvantage to those who originally qualified at 0.65.

3. We note in the cover letter of December 15 that EPA still has an interest in the allowance of accelerated aging techniques being used to determine the maintenance of solar reflectance. We note that the cover letter comments that "most stakeholders are against the allowance of accelerated aging". We would like to know, specifically, who are those stakeholders in opposition to permitting accelerated aging and can we, kindly, see copies of the documents they have submitted stating and supporting their opposition.

Also, as you know, our company has been a longtime proponent of accelerated aging as a technique to determine maintenance of solar reflectance and has submitted to EPA significant test data to illustrate the value of that technique.

It is apparent to us that the roof products specifications and eligibility criteria are both evolving matters in the EPA ENERGY STAR program. The current proposed document incorporates many different changes and, if we were to make an educated guess, this document will be followed somewhere down the road by a new version making more changes. An accelerated weathering standard will make response to these changes more efficiently and more effectively. Our company, and others, will be happy to visit with you on this subject upon your request.

4. With respect to the new requirement for thermal emittance, setting that requirement at 0.75 ignores at least two very important facts. One of those facts is that level would probably eliminate the largest volume and lowest cost to consumers of products currently being successfully used to reflect the sun's rays from a low slope roofing system resulting in lower under roof temperatures and prolonging the life of the surface the coating is applied to.

The second consideration is that this 0.75 standard ignores something that appears in the Draft I Partner commitment at the foot of page 1. In that section EPA acknowledges variations based on "geographic location". This has been a continuing argument advanced by a broad range of companies who are convinced that one size cannot fit all applications. While the emittance standard of 0.75 may be of value in the warm, sunny regions of the United States it would be inappropriate to enforce those values at the geographic locations that form the northern portion of the United States. In the hot, sunny southern climates it is the cooling season that drives the desire and benefits most, perhaps, by the suggested emittance of 0.75. In the cooler climate areas of our country it is lowering heating season energy costs that is of prime importance. If the emittance is established at the level suggested by this new proposal the energy benefits may be reduced in the northern states. Some understanding and compromise on that issue must be addressed. We are certain that you will find assistance for doing so from other individual companies or from such organizations as the Roof Coatings Manufacturers Association.

5. We may be wrong but it appears that this new Version is requiring for each new qualified roof product test data not required in the original Partnership Commitment or Eligibility Criteria. This discriminates against new entrants and gives an unfair competitive advantage to those who qualified products under the standards of the original Energy Star Roof Products Program.

6. We have another question about the thermal emittance requirement. The current solar reflectance requirements are 0.65 initial and 0.50 at a three year maintenance period. Is the proposed thermal emittance of 0.75 the standard at time of initial application only or the standard after three years exposure?

7. Page 6, paragraph 4) states that "manufacturers are required to perform tests and self-certify product models that meet the Energy Star Requirements". From the very first meeting members of RCMA had with Rachel Schmeltz in Washington those from the

association in attendance at that meeting urged EPA not to permit self-certification. From our prospective this could easily lead to fraud. That is one of the reasons why EPA and consumers would be best served if the sole method of determining product eligibility, for new products, is as illustrated in paragraph C), page 8.

8. The Version 2.0 prohibits the test surface of each sample from being washed, cleaned or wiped etc. in any fashion prior to the testing for solar reflectance. The fact that ENERGY STAR will designate on its Qualified Product list which products were cleaned and “describe the difference between findings reported for clean samples vs. those reported for samples that are not clean” is totally an insufficient manner in which to overcome the advantage given to those who had done their testing on clean surfaces versus those who cannot test on surfaces that have been cleaned.

9. The thermal emittance requirement cites a test method which was apparently to be used following initial application of the qualifying product. Since this was not a requirement at the time the ENERGY STAR products program commenced it is unreasonable to assume that producers of qualified products tested it for thermal emittance at the time their product was first applied to the roof. Please tell me how you intend to compensate for this apparent defect in the proposed version 2.0.

We are not going to burden you now with a lot of documentary support. We may have given you too much to easily read and digest above.

We have tried to spare you with regard to all of the questions raised by our review of this draft document and have tried to concentrate on what issues we believe are among the more important ones.

We look forward to your response.

Very truly yours,

Lewis S. Ripps

cc: Rachel Schmeltz, EPA
Steven Ryan, EPA